

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
DIVISION OF SHREVEPORT

ERICA BROWN AND JEREMIAH
GREEN, INDIVIDUALLY AND ON
ON BEHALF OF THE ESTATE OF
RUBY GREEN

§ CIVIL ACTION NO. 5:21-CV-02406-SMH-
MLH

V.

§ JUDGE S. MAURICE HICKS, JR.

PMG OPCO-WASHINGTON, LLC
D/B/A BOOKER T. WASHINGTON
SKILLED NURSING &
REHABILITATION AND KOURTNEY
BROWNLEE

§ MAGISTRATE JUDGE HORNSBY

**DEFENDANTS' MOTION TO STAY PROCEEDINGS PENDING APPEAL FIFTH
CIRCUIT COURT OF APPEALS RULING IN *MITCHELL v. ADVANCED HCS, LLC***

For the reasons set forth in the accompanying Memorandum, Defendants PMG OPCO-Washington, LLC d/b/a Booker T. Washington Skilled Nursing & Rehabilitation Center (“BTW”) and Kourtney Brownlee (“Brownlee”), move to stay this matter pending the ruling of the Fifth Circuit Court of Appeals in *Mitchell v. Advanced HCS, LLC*, Case No. 21-10477.

Respectfully submitted,

By: /s/ Ronald E. Raney
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LLC D/B/A BOOKER T. WASHINGTON SKILLED
NURSING & REHABILITATION CENTER, AND
KOURTNEY BROWNLEE**

CERTIFICATE OF SERVICE

A copy of the foregoing Motion to Stay Proceedings Pending Appeal of *Mitchell v. Advanced-HCS, LLC* has been served upon all counsel of record pursuant to the court's electronic docket system this 12th day of October, 2021.

/s/ Ronald E. Raney